

EXHIBIT 16

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4

5 -----) MDL No. 2804

6 IN RE NATIONAL PRESCRIPTION)

7 OPIATE LITIGATION) Case No. 17-md-2804

8)

9 This document relates to:) Hon. Dan A. Polster

10 All Cases)

11 -----) VOLUME I

12

13 HIGHLY CONFIDENTIAL

14 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

15

16 The videotaped deposition of STEPHEN SEID,
17 called for examination, taken pursuant to the Federal
18 Rules of Civil Procedure of the United States District
19 Courts pertaining to the taking of depositions, taken
20 before JULIANA F. ZAJICEK, a Registered Professional
21 Reporter and a Certified Shorthand Reporter, at the
22 offices of Dechert LLP, Suite 3400, 35 West Wacker
23 Drive, Chicago, Illinois, on December 12, 2018, at
24 1:43 p.m.

1 material to McKesson?

2 A. Or if they put a cover on it, like a cover
3 letter, we'd have to approve that.

4 Q. And where is that protocol? How -- was
5 there some sort of an agreement that that would be the
6 way it would work?

7 A. An agreement with who?

8 Q. With McKesson.

9 A. There was no agreement with McKesson,
10 because if they wouldn't agree with it, we wouldn't do
11 it.

12 Q. So you would ask McKesson to market
13 OxyContin in a particular way?

14 MR. STANNER: Objection; form, foundation.

15 MR. HOFFMAN: Object to form.

16 BY THE WITNESS:

17 A. We -- if -- if for some reason we would do
18 OxyContin, which, again, would be highly unlikely, is
19 they would have -- they couldn't change a comma on
20 what was being sent out.

21 BY MS. CONROY:

22 Q. And you would pay them for that service?

23 A. Yes.

24 Q. And that would be true of Butrans?